

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
CIVIL ACTION NO.: 4:19-cv-00030-BO

STAN C. STANLEY,)
)
Plaintiff,)
)
)
v.)
)
UNIVERAL CABLE HOLDINGS, INC.)
d/b/a SUDDENLINK)
COMMUNICATIONS,)
)
Defendant.)
)

**AFFIDAVIT OF
TRACY FRYER-WILLIAMS**

I, Tracy Fryer-Williams, being duly sworn, deposes and says as follows:

1. I am over eighteen years of age, am not under any legal disability, and am competent to make this declaration. My statements in this affidavit are based on my personal knowledge.
2. I was hired by Suddenlink on March 30, 2015 for the position of account executive in the commercial sales department in the Greenville, North Carolina office.
3. When I was hired, my direct supervisor was Mike Tarrant, the Regional Director of Sales. Tarrant was based out of the Greenville North Carolina office but was also assigned to the West Virginia Team and would travel there often during the first few months of my employment.
4. Shortly after I was hired, Tarrant would engage in conversation about my personal life, he would question me about my dating preferences, my sex life and why I was single. I felt the line of questioning was very inappropriate, awkward but I was new and just starting my

position with Suddenlink, I didn't really know how to react. His comments weren't isolated instances, on one occasion he asked me if I would ever consider dating a married man, I was shocked, I knew he was married and I felt like he was propositioning me or feeling me out to see if I might engage in some kind of sexual relations with him. It was obvious I was nervous and uncomfortable. Now and at that time, I believed I was being sexually harassed.

5. Stan "Cameron" Stanley and I worked closely together, he trained me from the beginning of my employment at Suddenlink and we built a rapport. Also, I knew Stanley had been with Suddenlink for a long time and would know what I should do, so I told him what I experienced with Tarrant and that I felt it was sexual harassment. Stanley advised that I should report this to human resources because it was wrong and he could see the effect it was having on me personally.

6. In or about August 2015, Eric Harris VP of Sales called Scott McKittrick, Human Recourses representative and told him that I reported there being hostility between my teammates and I. I was being harassed by Sherry Cooper and Casey Bailey. There was name calling, derogatory comments and rumors being spread throughout our department.

7. I also reported to Harris that Tarrant was not properly allocating customer accounts and that accounts that I was working also tracking through our employee database Salesforce were being moved out of my name and transferred to other sales reps although assigned to me.

8. I had also been cornered and confronted in an office by Cooper about an account that was assigned to me by Mike Tarrant that she felt was hers. She warned me about my crossing her or any other members of the team.

9. Shortly after that exchange, I was with Chris Manning on a conference call. During that call, I heard Cooper tell Manning that I was a stupid bitch and not to call her again to help me.

10. Scott McKittrick traveled to the Greenville office to interview me, Stanley,

Manning, Tarrant, Cooper, Bailey, and Penny. Everyone knew who was being interviewed and why the interviews were taking place. During my interview with McKittrick, I again reported that Tarrant was sexually harassing me although I was worried about possibly losing my position with Suddenlink I felt like something needed to be done to stop Tarrant. McKittrick did not seem surprised by my reports about Tarrant and just shook his head.

11. Once McKittrick left the Greenville office, things got worse for Stanley, Manning, and me. Cooper and Bailey especially made the work environment miserable. Cooper would curse and make snide remarks to and at me and Stanley anytime we were near her and Bailey would constantly comment that I was lazy or stupid. Both Cooper and Bailey would complain to Mike Tarrant that I didn't know how to do my job and they point at me, whisper, and laugh at me whenever I entered a room.

12. It was eventually clear that I was not going to getting any help from the reporting to McKittrick, so as the harassment from my sales team colleagues worsened in our office, I felt I had no choice but to start reporting through the ethics hotline or to Andrea Nelson a Director of Human Resources and Scott McKittrick's boss and eventually to Colleen Schmidt an Executive Vice President of Human Resources. I continued escalating my reports because nobody was helping me, Stanley, or Manning and our work environment was getting worse. Stanley saw how bad I was being treated and we discussed the toll it was taking on me.

13. Stanley was also interviewed multiple times by human resources about what he saw and heard.

14. After Stanley's initial interview with McKittrick, Tarrant moved Stanley from a closed private office on the other side of the Sales Dept. to a cubicle between Cooper and Bailey and within 3 ft. of Tarrant's office. Stanley had been in an office with a closed door since I started

and I believe he was moved out of retaliation for supporting my complaints about harassment and his interview with McKittrick.

15. In the first few weeks after his initial interview with Scott McKittrick, Stanley and Manning also became targets of derogatory comments and obvious hostility from Cooper, Bailey, and Penny. I told Stanley that he should go to human resources about how he was being treated after supporting my reports of harassment. Stanley was nervous about making any reports to human resources and feared he would lose his job, so he continued to suffer daily, in silence. Stanley also told me he thought if he did not work so closely with me that it would alleviate some of the hostility towards us. When it became clear that Stanley was not going to speak up for himself, I made the decision to report to human resources that Stanley was being treated differently than he was before his interview with McKittrick and speaking up on my behalf about the mistreatment I endured.

16. In addition to moving Stanley's office, Cameron also lost a company assigned vehicle that he had been given to drive without any reasoning.

17. Tarrant also stopped including Stanley and Manning in our weekly meetings where we discussed potential customers, customer proposals and services, and whatever else was going on with the team. It had been helpful for all sales reps to have Stanley and Manning in those meetings because of how involved they were in managing projects, reporting to the sales reps the progress that included construction and ensuring everything was moving to installation as forecasted and planned.

18. Once Stanley and Manning were no longer attending the weekly sales meetings, Tarrant, Cooper, and Penny would make comments about Stanley not doing his job during those meetings. I stood up for Stanley, but that only made things worse for both of us.

19. In August 2016, Cooper and Stanley were in a weekly meeting with Chris Manning and Mike Tarrant to go over projects, her sales. At some point Cooper made a comment about Stanley being my personal assistant to Mike Tarrant. Then Cooper accused Stanley of attacking her and that she was intimidated by him. Cooper's accusations caused a huge commotion in the office because she went through the office yelling and walking through the Sales Department cubicles. Stanley followed behind her with a confused look on his face and kept asking her what she was talking about. Eventually both Cooper and Stanley walked out of the building. Later that day, Stanley told me that he was worried that Cooper would file a false complaint against him and he would lose his job.

20. The following morning, in a sales meeting, Cooper announced to the sales team that she had nothing to worry about because HR would handle Stanley.

21. Knowing that Stanley would not report Cooper's conduct, I reached out to the ethics hotline and filed a complaint on his behalf the following day. The ethics hotline took my complaint and put me in contact with Andrea Nelson. I spoke to Nelson in detail about all of my complaints and everything that had transpired in the last year. Nelson acknowledged to me that she was completely unaware of any of McKittrick's investigations into complaints made about the Greenville office. I specifically told her about Cooper's false accusations against Stanley and asked that she please step in and investigate. At the end of the call, she asked me to have Stanley give her a call.

22. In August 2016, I saw McKittrick in our Greenville office. I immediately assumed he was there to terminate Stanley's employment because of the allegation that Stanley attacked and intimidated Cooper. Cooper had made that complaint just a few days prior to McKittrick coming to the Greenville office. I had to do something because Stanley had not done anything

wrong, so I called Nelson directly that morning.

23. During that call, I asked her if she was aware that McKittrick was in the Greenville office and she said she wasn't aware. She said she needed to make a call, so we hung up. Nelson never followed up with me; and, to my knowledge Cooper's false accusations were never investigated.

24. Later that day, McKittrick fired Tarrant. At first, I thought that Tarrant being fired would fix the office culture and stop Stanley and me from being harassed. I was wrong. Cooper and Bailey blamed me for Tarrant being fired and increased their verbal attacks against me and Stanley. It got so bad that I hated going to work, but I could not quit because I had to support my family.

25. I feared being fired, so I began documenting every incident, saving all current and previous email correspondences.

26. Tarrant was replaced by John Autry.

27. Nobody ever stepped in to stop Cooper, Bailey, and Penny from harassing Stanley and me.

28. Despite showing that my customer accounts were tampered with, I was accused of not making my monthly revenue goals. In February 2017, I was terminated. I believe I was fired because I reported the sexual harassment and daily harassment I received in the workplace. It was easier to fire me than to change the culture of the Sales Team and the Greenville office.

29. Following my termination, I filed a charge of discrimination against Suddenlink with the Equal Employment Opportunity Commission, Raleigh Area Office. Stanley drove me to the office to submit my complaint and was available as a witness if.

30. I was later hired by CenturyLink as an account representative working on

commercial accounts. Like with Suddenlink, my job was to sell telecommunication services to private businesses in the Eastern, North Carolina area.

31. I kept in contact with Stanley, Manning, and others from Suddenlink after I began working for CenturyLink.

32. Later in 2017, Stanley emailed me asking for my help with a customer account I started while I was with Suddenlink. I provided the information necessary to complete the project, which was a help to Suddenlink even though they treated me so poorly.

33. In late July 2017, my dog died and within a few weeks I also lost a cat, I was devastated. I reached out to Stanley as a friend whom I still spoke to regularly. He listened to me process and deal with the loss of my pets and other issues I was having in my personal life. By that point, Stanley and I had become friends, not just former co-workers our families had become close over the years.

34. In late August 2017, Stanley told me that Penny accused him of giving me proprietary and/or confidential information belonging to Suddenlink. Initially, I thought Stanley was joking. Then Stanley told me he was being investigated by human resources for giving me the information to call into a conference call on August 25, 2017 about an e-rate bid for Beaufort County Schools.

35. Schools are considered government accounts at CenturyLink or Suddenlink. I never worked with government accounts and would get no benefit from knowing anything about Suddenlink's bid for a project with Beaufort County Schools.

36. Stanley did not give me any confidential or proprietary information belonging to Suddenlink at any time after I was fired, including the dial-in instructions to participate in a conference call on August 25, 2017.

37. I did not call into a conference call organized by Suddenlink on August 25, 2017 or any other day after I was fired.

38. No representative of Suddenlink ever asked me whether I called into their conference call on August 25, 2017. Had I been asked, I would have told them no and provided any other information they requested.

AND FURTHER THE DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on January 11, 2021.

Tracy Fryer-Williams
TRACY FRYER-WILLIAMS

Sworn to and subscribed before me
this the 11 day of January, 2021.

K. Dawn Freeman
Notary Public

K. Dawn Freeman
Handwritten Name of Notary Public

My Commission Expires: 1-16-2024

